

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Minnesota Chamber of Commerce, a	)	
Minnesota nonprofit corporation,	)	Case No.: 23-CV-02015 (ECT/JFD)
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
John Choi, <i>in his official capacity as</i>	)	
County Attorney for Ramsey County,	)	
Minnesota; George Soule, <i>in his official</i>	)	
<i>capacity as Chair of the Minnesota</i>	)	
Campaign Finance and Public Disclosure	)	
Board; David Asp, <i>in his official capacity</i>	)	
<i>as Vice Chair of the Minnesota Campaign</i>	)	
Finance and Public Disclosure Board;	)	
Carol Flynn, <i>in her official capacity as</i>	)	
Member of the Minnesota Campaign	)	
Finance and Public Disclosure Board;	)	
Dave Kleis, <i>in his official capacity as</i>	)	
Member of the Minnesota Campaign	)	
Finance and Public Disclosure Board;	)	
Stephen Swanson, <i>in his official capacity</i>	)	
<i>as Member of the Minnesota Campaign</i>	)	
Finance and Public Disclosure Board; and	)	
Faris Rashid, <i>in his official capacity as</i>	)	
Member of the Minnesota Campaign	)	
Finance and Public Disclosure Board,	)	
	)	
Defendants	)	
	)	

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**STIPULATION FOR  
SUBMISSIONS RELATING TO  
PLAINTIFF'S PETITION FOR  
ATTORNEY'S FEES AND  
COSTS**

Plaintiff intends to file a Petition for Attorney's Fees and Costs and associated submissions, to which Defendants anticipate filing responsive submissions. The parties have met and conferred about a briefing schedule, and stipulate to request the Court to order these submissions be made pursuant to the following briefing schedule and terms:

1. Plaintiff will file its petition and associated submissions by February 21, 2025—these submissions will not include an engaged expert's declaration addressing the reasonableness of the hourly rates and fees charged in this matter;
2. Defendants will file their submissions responding to Plaintiff's petition by March 3, 2025—if Defendants' responsive submissions do not object to the reasonableness of the hourly rates and fees, then Plaintiff will not engage an expert to submit a declaration on the reasonableness of the hourly rates and fees charged in this matter;
3. Plaintiff will file its reply submission by March 17, 2025—if Defendants' responsive submissions object to the reasonableness of the hourly rates and fees charged in this matter, then Plaintiff may submit an engaged expert's declaration with its reply;
4. If Plaintiff submits an engaged expert's declaration with its reply, then Defendants may submit a sur-reply by March 24, 2025;
5. Hearing on Plaintiff's petition will be scheduled by the Court.

So stipulated:

Dated: February 18, 2025

WINTHROP & WEINSTINE, P.A.

*s/Thomas H. Boyd*

Thomas H. Boyd, #0200517  
Tammera R. Diehm, #0327566  
Kyle R. Kroll, #0398433  
Jordan E. Mogensen, #0400919  
Cianna G. Halloran, #0402841  
225 South Sixth Street  
Suite 3500  
Minneapolis, Minnesota 55402  
(612) 604-6400  
tboyd@winthrop.com  
tdiehm@winthrop.com  
kkroll@winthrop.com  
jmogensen@winthrop.com  
challoran@winthrop.com

*Attorneys for Plaintiff*

Dated: February 18, 2025

KEITH ELLISON  
Attorney General  
State of Minnesota

*s/ Janine Kimble*

JANINE KIMBLE (#0392032)  
MATT MASON (#0397573)  
NATHAN HARTSHORN (#0320602)  
Assistant Attorneys General

445 Minnesota Street, Suite 1400  
St. Paul, Minnesota 55101-2131  
(651) 757-1415 (Voice)  
(651) 297-7206 (TTY)  
[janine.kimble@ag.state.mn.us](mailto:janine.kimble@ag.state.mn.us)

*Attorneys for State Defendants*

JOHN J. CHOI  
Ramsey County Attorney

Dated: February 18, 2025

*s/ Kristine Nogosek*

Kristine Nogosek (#0304803)  
Kevin S. Plaisance (#0504690)  
Assistant Ramsey County Attorney  
121 Seventh Place East, Suite #4500  
Saint Paul, MN 55101  
651-266-3230 (Nogosek)  
651-266-3178 (Plaisance)  
[kristine.nogosek@co.ramsey.mn.us](mailto:kristine.nogosek@co.ramsey.mn.us)  
[kevin.plaisance@co.ramsey.mn.us](mailto:kevin.plaisance@co.ramsey.mn.us)

*Attorneys for Defendant Ramsey County  
Attorney*